

**IN THE DISTRICT COURT  
FOR THE UNITED STATES OF AMERICA  
WESTERN DISTRICT OF TENNESSEE**

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**ISSACCA POWELL,  
individually and as representatives  
of a class of all similarly situated individuals,  
Plaintiffs,**

**vs.**

**BILL OLDHAM,  
Sheriff of Shelby County,  
Individually and in his official capacity.  
Defendant.**

**CAUSE NO.: 2:16-cv-2907  
Jury Trial Requested  
Complaint - Class Action**

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**MOTION TO PROCEED IN FORMA PAUPERIS**

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Comes now, Issacca Powell, by and through his attorney of record, and files this Motion to Proceed In Forma Pauperis, and for cause attaches, as Exhibit A, the Application to Proceed in District Court Without Prepaying Fees or Cost (AO 239), and would state as follows:

1. That he has filed a Class Action civil rights case against the Sheriff of Shelby County as the representative of the Shelby County Government.
2. That he is employed but his income is exceeded by his expenses.
3. That he is married and has seven (7) children which he is financially responsible for.

4. That he does not have the financial resources to pay the filing fee in advance.
5. That the interest of justice favors granting this motion.
6. That suit is not brought in bad faith.

Respectfully submitted,

The  
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s/ Claiborne H. Ferguson  
**CLAIBORNE H. FERGUSON (20457)**  
Attorney for Defendant